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January 5, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday ("Hlday") is currently at liberty on a bond that contains numerous conditions including home detention and electronic monitoring. On January 8, 2021, Hlday is scheduled to have throat surgery (confirmation of the surgery had been provided to the government and Pretrial Services, "Pretrial"). This procedure will require a three day admission to the hospital and the removal of the GPS bracelet. Pretrial has advised me that upon permission of the Court, Mr. Hlday may remove the bracelet himself the morning of the procedure and then Pretrial will meet him at his home to reattach it at the conclusion of his stay in the hospital. By this letter, Hlday respectfully requests that he be permitted to remove the GPS device upon arrival at the hospital and that it be reattached by Pretrial as soon as practicable upon his discharge.

In the next few days, Hlday's wife will be moving to Florida for employment purposes. To date, due to Hlday's home confinement, his wife has handled all chores that require travel outside the household such as shopping for groceries and transporting their son to school, sports practices and other events. After she moves, Hlday respectfully requests that he be permitted to leave his home to handle these tasks so long as they are approved by Pretrial.

The government, by Assistant United States Attorney Andrey Spektor, and supervising Pretrial Services, by United States Pretrial Officer Brandon Miles, consent to these applications.

Thank you for your Honor's consideration of these requests.

Very truly yours,

Sanford Talkin

Sanford Talkin

cc: AUSA Andrey Spektor (by ECF)
AUSA Mark Bini (by ECF)
USPTO Brandon Miles (by email)